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INDIVIDUAL TRAINING ACCOUNT MANAGEMENT

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BOSTON BEST PRACTICES GUIDE

ORGANIZATION OF THE GUIDE

Boston decided to take a "best practices" approach to developing the processes required to ensure effective, user-friendly, non-duplicative referral and documentation practices in implementing the policies of Boston's Workforce Investment Board and Workforce Investment Area agency with respect to the provisions of the Workforce Investment Act of 1998. Representatives of Boston's three One-Stop Career Centers, the Job Training Alliance and other community based training providers, the Mayor's Office of Jobs & Community Services and the Boston Private Industry Council, (Boston's Workforce Investment Board) began meeting in May 2000. Having agreed to the principles and definitions that would guide practice (Section I) and agreeing to the central role of a "best practices" approach (Section II), the "Best Practices Work Group" (BPWG) designed a work flow (Section III) with accompanying documentation (Customer Portfolio Summary) that would ensure that appropriate customers could access training funds through an Individual Training Account (ITA) from any approved service provider or One-Stop Career Center in Boston's workforce development system (Section IV). The procedures for certifying customer eligibility for ITAs are described in Section V, "Intensive and Training Services under WIA."

The **Customer Portfolio Summary (CPS)** serves as summary[1] level documentation of the provision of core and intensive services (i.e., the application of the procedures described in Section V of this guide). It was developed by the BPWG and is provided, along with its instructions, as a separate stand-alone package to allow revisions as needed to meet customer need and evolving policies.

In addition to the Sections enumerated above, this Best Practices Guide provides Attachments that:

1. Summarize the policy decisions of the Workforce Board that impact the practices recommended by the Best Practices Work Group and approved by the committees of the Board;
2. Enumerate the options for assessing and verifying information collected on the CPS;
3. Summarize the Student Performance Levels (SPL) yielded by assessments of English Speakers of Other Languages (ESOL) to enable staff of career centers and training providers to interpret such results and make appropriate referrals. Please note that Attachment 3 is a highly abbreviated version of SPL's. More detailed documents are available.

Documents that provide:

1. Boston One Stop Career Centers' hours of operation, and membership processes;
2. Quarterly schedules of WIA/Training Information Sessions at each of the career centers; and
3. Names and contact information for the lead WIA staff members at each career center

are updated and issued throughout the year as such information changes.

The BPWG meets six times a year to continuously review and improve these processes. It makes recommendations to the Workforce Advisory Group (WAG), comprised of representatives of the major stakeholders in the Boston workforce development and labor exchange systems, including WIA mandated partners. The WAG advises the Employment & Training Systems Committee of the Workforce Investment Board.

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[1] The CPS serves as a comprehensive summary of case materials including interviews, assessment instruments, etc. included in the customer's portfolio file.

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Boston Best Practices Guide

Management of Individual Training Accounts (ITA) under the Workforce Investment Act

I. WIA Principles & Definitions

A. WIA legislation emphasizes seven central principles:

1. **Streamlining** services and information to participants through a One-Stop delivery system

2. **Empowering individuals** to obtain needed services to enhance their employment opportunities

3. **Ensuring universal access** to core employment-related services

4. **Increasing accountability** of States, localities and training providers for performance outcomes

5. **Establishing a stronger role** for Local Boards and the private sector

6. **Providing increased State and local flexibility** to implement innovative and comprehensive workforce investment systems

7. **Improving youth programs** through services which emphasize academic and occupational learning

The USDOL Overview of WIA (September, 1998, page 1) clearly articulates the importance of local control, employer involvement, customer service and customer choice:

"Title I of the legislation is based on the following elements:

- Training and employment programs must be designed and managed at the local level – where the needs of businesses and individuals are best understood.
- Customers must be able to conveniently access the employment, education, training, and information services they need at a single location in their neighborhoods.
- Customers should have choices in deciding the training program that best fits their needs and the organizations that will provide that service. They should have control over their own career development.
- Customers have a right to information about how well training providers succeed in preparing people for jobs. Training providers will provide information on their success rates.
- Businesses will provide information, leadership and play an active role in ensuring that the system prepares people for current and future jobs."

B. Local Principles

Boston implementation incorporates and expands upon the WIA principles.

1. No Wrong Door: We are a workforce development and labor exchange system

Boston is committed to continuing direct customer access to community based training providers. This requires increased administrative and programmatic coordination between training providers and the one-stop career centers.

2. Variation in practice is inherent in a diversified system responsive to customer needs

Continuing direct customer access to community based training providers creates a range of options for initial system contact and means that there will be a variety of practices by individual organizations across the system.

3. Multi-Methodological Approach

Boston's training and education providers have a long history of delivering quality services to customers/participants. Over the course of this history, organizations have used standardized instruments and developed customized approaches to assessment with various constituencies, as appropriate. A Best Practices approach to process development and quality improvement implies a menu-driven approach to assessment methods.

4. Customer Service & Process Improvement: Streamline services/reduce duplication

Information gathered at any point in the customer's engagement with the system should be passed along to the next person/organization in the system that will provide service to the customer.

5. Informed Customer Choice

Customers, having been provided information on their options, and understanding the performance history of training providers, are the ultimate decisionmakers regarding choice of training program. Staff may indicate their concurrence or disagreement with a customer's choice, but informed customer choice prevails in the selection of a training provider.

6. Best Practices

Best Practices is the vehicle for setting standards based on quality of practice that incorporates variation of practice, multi-methodological approaches and customer choice. Best Practices is a continuous improvement process.

C. Definitions

Core services: involve the provision of labor market information, initial assessment of skills and needs, job search and placement assistance, information about and referral to supportive services and follow-up services after placement. Any job seeker may access core services in the One-Stop system.

Dislocated Worker: An individual who has been terminated or laid off, or who has received a notice of termination or layoff, from employment, is eligible for or has exhausted entitlement to unemployment compensation; or has been employed for a duration sufficient to demonstrate to the appropriate entity at a one-stop center attachment to the workforce but is not eligible for unemployment compensation due to insufficient earnings or having performed services for an employer that were not covered under a state unemployment compensation law.

Intensive services: involve more comprehensive assessments, development of individual employment plans, group and/or individual counseling, case management and short-term pre-vocational services. Job seekers must register, and have their eligibility determined in order to receive intensive services.

Individual Training Account (ITA): For adult and dislocated worker training, ITAs are the vouchers issued to customers for use at approved training providers. ITAs authorize payment for training. The ITA replaces the group contract mechanism used under JTPA.

Training services: include occupational skills training, job readiness training, skill upgrading; and also, adult education and literacy activities provided in conjunction with other training. Training services are available only to eligible customers who are still unable to find jobs after receiving intensive services.

Transferable skills: refers to skills that, while they may not *precisely* match the skill requirements of a specific job, provide sufficient competence in the basic tasks of the work that the person is likely to be able to perform the job. For example, a person may have never worked as a meeting scheduler; however, s/he may have run a household in which s/he scheduled appointments for other household members.

Unemployed: An individual who is without a job and who wants and is available for work.

II. Why a "Best Practices Guide?"

The Workforce Investment Act requires that eligibility for a training ITA be based on an individual's inability to be employed without training. Lack of employability must be established using a "core" and an "intensive" service as defined by the Act. In addition, the Boston Workforce Board has established a priority of using ITAs for residents of Boston who are low-income individuals and/or working poor (see Attachment 1 for a summary of policy decisions by the Workforce Board that impact the determination of eligibility for ITAs.)

WIA establishes One Stop Career Centers as a primary system entry point for assessing and documenting that an individual needs training to become employed. Career centers deliver the core and intensive activities that assess this need. As a result, eligibility and assessment activities formerly conducted solely by training providers must be delivered in conjunction with the one-stops. The decision about which entity, the one stop or the training provider, should deliver which elements of an assessment to establish an individual's need for training becomes a decision based on collaboration between training providers and one-stops. The decision making process must have as its outcomes: 1) the conclusion that an individual cannot become employed without training; 2) choice of a training area/field and 3) selection of a training provider. However, the process steps required to produce this outcome depend upon:

- how the individual enters the workforce development system (through initial contact with a training provider, through initial contact with a career center or some other way),
- the specific assessment activities that have been conducted with that individual at the point of contact with the system,
- the role of specific assessment activities in the decision making process of each organization.[2]

In this Guide an individual assessment of employability is defined by a process that clearly articulates a number of key questions. These questions are captured in the Customer Portfolio Summary form. However, decisions regarding the selection of tools that are valid and appropriate to provide the answers to these questions are left to the practitioner based on standards of quality developed by a Best Practices process. (For examples, see Attachment 2, "Menu of options for verifying information collected on Customer Portfolio Summary.")

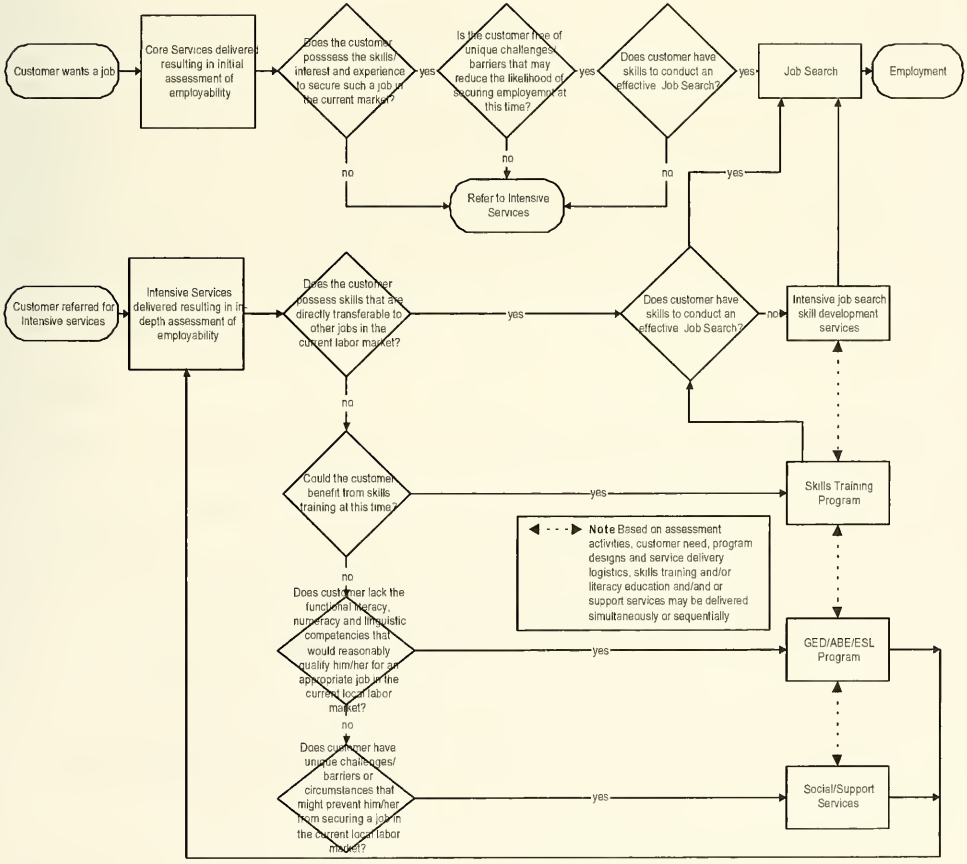
This guide is based on a series of discussions, meetings and recommendations of a Best Practices Workgroup representing training providers and career centers that built on the work of an ITA Subgroup of the Management Task Force (as of 01/01, the "Workforce Advisory Group"). The Best Practices Work Group will continue to meet, as needed, to ensure that the processes involved in the issuing of ITAs in Boston represent the highest standards of quality, customer

[2] For example, many training programs *at the outset of contact* with a potential program participant conduct in-depth interviews and interest inventories as part of their assessment of an individual's appropriateness for the program. These activities are among the "intensive" services career centers are mandated to provide under WIA. Training programs that continue to deliver these services under WIA need to be clear about the reason and cost-benefit of this investment of resources.

service and user-friendliness while meeting the administrative, legal and regulatory requirements of the Workforce Investment Act. The Workforce Advisory Group may adjourn and reconvene the Best Practices Work Group as needed.

III. WIA ITA Process Overview

The delivery of "core services" will result in an initial appraisal of an individual's employability. The only outcomes of the delivery of core services are 1) engagement in job search or 2) engagement in activities that comprise "intensive services." The possible outcomes of the appraisal of an individual's employability that may result from the delivery of "intensive services" are referrals to: 1) job search skills development; 2) a program of job skills training; 3) a program to develop educational/literacy/linguistic competency (GED, ABE, ESL); 4) programs providing social support (counseling, mental health, domestic violence, etc.)



IV. Career Center/Provider Referral Processes: Two Way Flow

Potential customers/participants in training programs may enter the workforce development system by first coming to a training provider or by first coming to a career center. In cases where either organization (career center or training provider) conducts activities with a job and/or training seeker that result in a direct referral to the other entity, these activities will be documented on a "Customer Portfolio Summary" and will initiate the creation of a file or "portfolio" that will be added to and will follow the customer, as appropriate, through the workforce development and labor exchange system. Material will be added to the "Portfolio" based on the best practices and needs of the organizations that engage with the customer.

V. Intensive and Training Services under WIA

The process of pursuing intensive and training services involves the coordination of the customer expressing her/his goals, the career counselor guiding the customer through a process of assessments and evaluations yielding information that will help determine training appropriateness. This process will allow Jobs and Community Services (JCS) staff to certify eligibility. The following are the steps that career center staffs and their job seeking customers must take to pursue intensive and training services under WIA. This is meant as an outline of the basic steps; more detailed information about forms and detailed procedures are available from the Mayor's Office of Jobs & Community Services.

A. Training Approval Process

Summary

In order to successfully be approved for training under WIA, a customer must be approved in the following series of steps:

1) **Initial Assessment** indicates a need for additional or intensive services to secure viable employment
2) **In-depth Employability Assessment** indicates that the customer:
    a) is appropriate for training
    b) does not have other barriers in their life that would either prohibit them from successfully completing training or to secure a viable job once training was completed; and
    c) is eligible for WIA services under Title 1A or 1D; and

3) **Certification of Training program**: the customer chooses a program approved as eligible for ITA funding under WIA in Boston

Detailed Description of Steps in Training Approval Process

1. Initial Assessment

Customers can begin pursuit of WIA services, including training, at one of the career centers, at any Training Service Provider/Vendor, or through the State's rapid response system. While career centers are responsible for the submission of a completed CPS to JCS for certification of training, intake and assessment activities may be initiated at any approved training vendor. In order to reduce duplication of effort and to provide quality customer service, training providers/vendors that conduct intake and assessment activities are expected to document these activities in the CPS and forward it to the Career Center.

Basic information about a customer is gathered through use of a questionnaire and/or interview. Information should include residency information, level of income, US citizenship and selective service status, a work history review, an education review, and identification of unique characteristics. An employability review for intensive or training services will include more than one of the following: a basic skill review, comparison of skills to employment options, failed job search or job acquisition activity, and special barrier considerations. The process of assessment is integrated with the review of eligibility and appropriateness for training (see section below).

The pursuit of training is one of four options available to a customer as a result of an initial employability assessment at the career center that determines that the customer cannot secure a viable job in the current market without intensive services. The other options include job search skills development, a program to develop basic educational, literacy or linguistic skills (GED, ABE, and ESL), and social support (counseling, mental health support, etc.). Occupational skills training is available to Boston job seeking customers under WIA. The training process offers training to those customers who most need these services in order to secure employment or improved earnings. Training is available in the form of individual training accounts in a system designed to offer customers information on program performance and quality while being fully informed about their range of options for training.

2. In-Depth Employability Assessment

a. Appropriateness for Training

In order to be eligible for training, a customer must be deemed appropriate for training by JCS. In order for JCS to make an informed decision, we require the following: a customer portfolio summary (CPS), a current resume, and any other relevant information. Appropriateness for training is documented on the CPS, and should include information that establishes that an individual:

i. lack skills for employment that make occupational training necessary to secure a reasonable job; and
ii. that their life situation enables them to reasonably enroll in and complete training in the time period identified.

The CPS is a summary of assessment and work experience information to be used by Career Centers and training vendors to facilitate the referral process. Career Center staff will utilize the Massachusetts One-Stop Employment System (MOSES), the Commonwealth's automated system, to input required WIA information. Additional labor market and training research information will be kept in customer case folders.

b. Ability to Make Use of Training

The career center counselor must confirm that the customer has no outstanding barriers that would prohibit him/her from successful completion of a training program or from finding viable employment upon completion. Such barriers might include: substance abuse, extreme family obligations, serious physical or mental health problems, domestic abuse, homelessness, etc.

c. Eligibility for Training

In order to be eligible for Title IA intensive or training services, a participant must:

i. be a Boston resident
ii. meet current income eligibility guidelines (150% of the Lower Living Standard Income Level for individuals and families)

In order to be eligible for Title ID intensive or training services, a participant must:

i. be a Boston resident
ii. or dislocated from a company in Boston
iii meet the above definition of a dislocated worker

3. Certification of Training Program

The customer seeking training, with assistance of the career center, must be able to document that the training provider's program is approved under the Boston qualification procedure. The particular program must be on the Boston Master Agreement training vendor list which is a subset of the Commonwealth's WIA training vendor list.

Financial resources must be in place so that the customer can pay for training; the sum of the contribution authorized by JCS plus any additional costs must be covered. (For example, if an approved course is covered by $5,000 contribution by JCS and the additional cost is $1,500, the customer must have a reasonable plan to cover the balance).

The customer seeking training must also establish a realistic job goal that is supported with labor market information. Individual job goals and labor market information will be noted in the CPS.

B. Priority Populations

Boston has identified the following characteristics to help identify barriers and prioritize those most in need of training:

1. An English reading and computing achievement at less than a 9th grade level. Since the best predictor of labor market success in the Boston market is educational achievement, persons who have advanced educational levels such as four year college degrees will not meet this priority, unless there are unusual and compelling circumstances. Unusual and compelling circumstances for training may include higher education that is outdated, educational credentials that include non-English language degrees, or education in a field that has been rendered obsolete by technological or economic change in the labor market.

2. Employed, but earning less than 150% of the Lower Living Standard Income Level for the Boston metropolitan area.

3. Lack of a good work history, with extensive periods of unemployment or underemployment, or of non-participation in the labor market.

4. A history of involvement with the courts that affects employability.

5. Dislocated workers living or previously working in Boston unable to gain employment at a wage similar to previous job. Due to overwhelming demand for services, Title ID eligibility will be limited to those who:
   a. received notice of separation within previous 12 months
   b. were actually separated within previous 12 months
   c. were determined eligible for unemployment within previous 12 months

6. Other identifiable or self-disclosed barriers to employment including a disability.

Customers are not required to submit proof of residency, income, or priority status. A self-declaration is to be considered sufficient to insure that these criteria are met. However, in accordance with federal law, proof of U.S. citizenship or documented immigrant status, age, dislocated worker, and selective service status will be required from WIA customers[3].

C. Training of Last Resort

Because of the limited nature of WIA funds for intensive and training services, customers are required to access and use other available funds for training before utilizing WIA funds.

The Boston Workforce Development system is organized to provide simple and direct access to necessary services for both job seekers and employers. As an integral part of the system, the

[3] The requirement for the inclusion of documentation of citizenship or immigrant status, and selective service status in a customer's file (as opposed to self-attestation of same) was initiated in May 2001. *The requirement for documentation of dislocated worker status was initiated October of 2001. Both acts are temporary measures* agreed to in negotiations with the Commonwealth Corporation. These procedures will be reviewed pending the outcome of an electronic review of the validity of self-attestation and may be subject to further change.

operation of the Individual Training Accounts (ITA) should also be as straightforward as possible. The purpose of this statement is to clarify the funding process that should be used to assist customers in achieving their training goals.

A customer who is eligible for training may be given an ITA using WIA funds, if such funds are available, under the following circumstances:

1.) The vendor whom the customer has chosen in consultation with a Career Center Counselor is not approved to receive Pell grants or other forms of State or Federal student financial assistance.

2.) The Customer has applied for other forms of assistance as may be appropriate, and

   a) has been determined ineligible, or
   b) has been approved for an insufficient amount, (WIA funds may be used for the balance remaining after other funds are applied) or
   c) a determination is pending. (Reimbursement to WIA funds must be made if the customer is subsequently eligible for a Pell grant.)

3.) The Customer is not eligible to have training in the appropriate occupational areas paid for through the Employment Services Program (ESP) of the Department of Transitional Assistance or through the Welfare to Work (WtW) program, the Youth Opportunity Grant (YOG) Program, or other such funding source.

4.) The Customer is eligible for support through ESP, WtW, YOG, or other such funding source, but the amount of the support is insufficient to pay for the full cost of the training, in which case WIA funds may be used for the balance remaining after other funds have been applied.

D. Adult Basic Education, English as a Second Language, and Combined Training Programs

Given the need to target the uses of available funds, Boston WIA Title I funds may only be used for training that has job placement and/or job readiness as one of its primary objectives and purposes of its design. Programs whose primary purpose is development of basic reading, writing or math skills are not eligible for these funds unless they meet the requirements and apply to become an approved vendor. Career Center customers have access to WIA Title II funded programs which provide adult basic education classes in ABE, GED and ESL.

E. Tracking and Documentation

1. Paper Documentation

The Customer Portfolio Summary documents the necessary information discussed above and currently is the formal document that enables JCS to approve training requests. JCS will use the CPS until an automated case management form is developed in MOSES. Training requests may

be denied if the information is not completed, and may also be denied if they are submitted less than 2 weeks prior to the training start date. Such requests are too late to complete the necessary transactions and contracts between JCS and the training provider prior to the start date of training. JCS reserves the right to reject requests based on the completeness, quality or timeliness of submissions.

2. Events/Activities to be Documented

In order to ensure the quality of service and documentation of outcomes, at a minimum, the following 13 events and activities must be tracked and recorded. Career centers are responsible for obtaining information related to the activities and data entry of items 1 – 5. They are responsible for data entry of items 6 – 13 when the customer or the training provider provides the information. Training providers are expected, as a condition of funding under ITAs, to provide the referring Career Center with information on program entry, training progress, and job placement. A training agency's failure to provide required information may result in their de-certification as a training provider.

1. Initial intake
2. Assessment
3. Eligibility determination
4. Research and selection of training
5. Referral to training
6. Training start
7. Midpoint and completion of training progress reports
8. Training drop-outs
9. Training completion
10. Job search/job development activities
11. Entered employment; basic placement information (employer, wage, hours, job title, benefits)
12. Confirmation of employment
13. Retention after 90 days and 180 days following employment entry.[4]

Information will be recorded using the MOSES system, which is described below. Career Center staff will document customer progress at a minimum of every 30 days in the case notes area of MOSES.

3. MIS System

Career Centers are responsible for transmitting information and conducting customer tracking through the electronic system established by EDIC in agreement with the Career Centers. Career Centers must be able to electronically submit all participant and activity information to the Commonwealth so it can electronically transmit all required aggregate data to our funding

[4] The Commonwealth's Department of Labor and Workforce Development is in the process of developing an agreement with the State Revenue office to assist with tracking job retention.

sources in a timely manner. This information will minimally include SPIR data; full details of this agreement will be worked out with the Career Centers in the future. SPIR data should be entered by 30 days after enrollment. JCS will review participant and training vendor data on a monthly basis on the MOSES system.

F. Outcomes

All WIA customers are expected to secure unsubsidized employment. Upon completion of training Working Poor customers are expected to achieve one of the following outcomes:

- employment with a new employer
- a raise in pay with the present employer
- increased responsibilities with the present employer

G. Support Services

Boston will limit the allocation of WIA support services funds to MBTA passes for Title IA customers. Career Center case management staff will determine the distribution of passes on a case by case basis.

H. Follow Up Services

All WIA customers will be offered follow up services for up to 12 months after placement. Please see the JCS Follow Up Policy.

I. Monitoring

JCS will formally monitor the delivery of WIA Title I services by the Boston Career Centers and training providers on an annual basis. In addition to these visits JCS will conduct periodic reviews of service and expenditure levels and determine if there is any need for technical assistance. Please see the JCS Monitoring Policy.

J. Rapid Response

JCS and the Boston Career Centers will continue to work closely with the Commonwealth Corporation Rapid Response Team.

K. Grievance Procedures

Boston Career Centers will comply with their respective Career Center Operator grievance policy. This policy and JCS Grievance and EEO policies must be posted in public area within each Career Center.

Attachment 1
Summary of policy decisions by Boston's Workforce Board that impact the determination of eligibility for ITAs

Date of Vote	Text of Vote	Background for and Implication of Vote
12/10/99	**Proportional Support:** The Board approves the principle of proportional support in the form of funding in the Memorandum of Understanding that will be negotiated with one stop partners under the Workforce Investment Act.	The Workforce Investment Act (hereinafter "the Act" or "WIA") requires that Local Workforce Boards negotiate Memorandum of Understanding (MOU) with "mandatory one stop partners." The one stop partner, after signing the MOU, is entitled to a seat on the Workforce Board. "Proportional support" means that the partner should pay for the share of the costs of providing core services proportionate to the share that their customers are of the total universe of job seeker customers. In order to continue the competitive model, the MOU must specify that proportional support for core operations be made in the form of funds, rather than agency staff, space or other resources. Section 121(c) of the Act and sections 20 CFR Parts 662.70 and 662.300(b) are the statutory and regulatory references, respectively.
2/3/00	**Limited Funds:** The Board finds that funds available for training under the Workforce Investment Act are limited, and accordingly, recommends that a priority be established for low income customers, including those who are the "working poor", and directs the staff to develop specific guidelines for both economically disadvantaged customers and for dislocated workers to assist Career Center staff and training vendors to target training services to such customers	Under section 134(d)(4)(E) of the Act, the Board is authorized to establish a priority for serving public assistance and other low income individuals if the funds allocated to the local area are limited. Since funding is generally limited, as acknowledged in section 20 CFR 663.600(b) of the regulations, priority **must** be given to recipients of public assistance or other low income persons, as determined by the local area in accordance with sections 20 CFR Parts 663.600(c) and 663.600(d).
2/3/00	**Principles governing the selection of training vendors:** The following principles are the governing policy for the selection of vendors to be approved to receive the Individual Training Accounts: I.) That vendors must demonstrate the achievement of a minimum of a 60% placement rate for the same or substantially similar training as is proposed. In subsequent years, the vendors will be expected to increase performance to a minimum of 70% to remain in consideration. (Note: neither the initial nor subsequent performance levels necessarily reflect final performance standards which will need to be determined by the Board. Rather, these numbers are used	WIA requires that most of the funds available for skills training services be distributed through Individual Training Accounts (ITA). This method can only be utilized by vendors that are certified by the Local Workforce Investment Board. The principles governing a vendor selection process should focus on including a broad range of potential training opportunities, at reasonable costs, and for varying lengths of time, in occupations that are in demand by employers in the area. The purpose that these principles address is to make available to customers the most effective range of training possible given the fact that financial resources are severely constrained. The principles will govern the operation of the Individual Training Account vendor selection

	to establish a threshold of achievement for consideration and for approval.) 2.) That vendors must demonstrate a history of, or commitment to, training and placing into employment low income persons. 3.) That vendors new to Boston, or which are beginning programs not previously offered, must demonstrate the capacity and commitment to meet the administrative requirements of the Boston system, including performance standards. The performance of all vendors will be evaluated at least annually, to determine their continuing eligibility to remain on the list and financial stability. 4.) That vendors must demonstrate substantial employer involvement in the design and operation of the training program, either by means of providing references of employers which have worked with the vendor and hired graduates, or by identifying an employer advisory committee which advises the vendor on the content, substance, and operation of the program. 5.) That, while no "cap" is established for the cost of the ITAs, the average of all ITAs in the system is expected to be approximately $4,000 per individual enrolled. The concept of continuous quality improvement is to be addressed by all potential vendors	process in the initial two-year period as required by the law. A period of subsequent eligibility will be implemented after the initial period, and will focus more substantially on performance within the initial period. Section 122 of the Act and 20 CFR Part 663, Subpart E-Eligible Training Provider are the statutory and regulatory references, respectively, regarding the selection of eligible training providers. Section 134 (d)(4)(G) of the Act and 20 CFR Part 663, Subpart D of the regulations provide guidance on the use of Individual Training Accounts.
4/6/00	**Priorities for intensive and training services:** The Boston Workforce Development system has traditionally provided services to the residents of the City who are most in need of assistance in order to become economically self sufficient. In that the funding available for the implementation of the Workforce Investment Act is severely limited, residents of the City most in need of assistance under the Act are to be prioritized for intensive and training services in the Career Centers. The following characteristics should be used by the Career Centers to identify the dislocated workers to receive intensive and training services: An English reading and computing achievement at less than a 9th grade level. (Since the best predictor of labor market success in the Boston market is educational achievement, persons who have advanced educational levels such a	[Please note that this policy statement includes the principle of self-declaration.] WIA allows the Board to establish priorities for service for low income persons and welfare recipients if funds are limited. In a previous decision (see above), the Board determined that WIA funds for low income individuals are limited and that a priority for service within the context of the Act should be established. The staff was directed to research and recommend a suitable policy that will insure scarce resources are targeted to those most in need of assistance. An analysis of the data yielded by Boston's ITA demonstration project conducted in FY'00 led to the development of the recommended policy for prioritizing the use of ITA funds. Section 134(d)(4)(E) of the Act, and sections 20 CFR Parts 663.600(b), 663.600(c) and 663.600(d)

	college degrees will not meet this priority, unless there are unusual and compelling circumstances.) Employed, but earning less than 150% of the Lower Living Standard Income Level for the Boston metropolitan area. (capped up to 20% of available training funds should be used to assist persons in this category to achieve self sufficiency.) Lack of a good work history, with extensive periods of unemployment or underemployment, or of non-participation in the labor market. A history of involvement with the courts that affects employability. Dislocated workers living or previously working in Boston whose education achievement, or English language ability may affect re-employment. Unusual and compelling circumstances for dislocated workers may include higher education that is outdated, is inclusive of non-English language degrees, or is in a field that has been rendered obsolete by technological or economic change in the labor market. Other identifiable barriers to employment including a disability. Customers are not required to submit proof of eligibility or of priority status. A self-declaration is to be considered sufficient to insure that the purposes of this policy are met. However, to insure that resources are, in fact, being targeted as this policy envisions, a random sample of customer eligibility may be conducted periodically.	of the regulations are the statutory and regulatory references.
4/6/00	**Training funds of the last resort:** The Boston Workforce Development system is organized to provide simple and direct access to necessary services for both job seekers and employers. As an integral part of the system, the operation of the Individual Training Accounts (ITA) should also be as straightforward as possible. The purpose of this statement is to clarify the funding process that should be used to assist customers in achieving their training goals. A customer who is eligible for training may be given an ITA using WIA funds, if such funds are available, under the following circumstances: 5.) The vendor which the customer has chosen in	The Workforce Investment Act (WIA) envisions a training system that relies on a variety of sources to support training activities, and which uses the WIA allocation only if the customer is unable to obtain other grant assistance including Pell, or if the customer requires assistance in addition to what other grants provide. A policy statement regarding this aspect of the law is needed to insure that our system has guidance in implementing this new provision. See section 134 (d)(4)(B) of the Act and sections 20 CFR Parts 663.310 and 663.320 of the Regulations for additional guidance.

	consultation with a Career Center Counselor is not approved to receive Pell grants or other forms of State or Federal student financial assistance. 6.) The Customer has applied for other forms of assistance as may be appropriate, and d) has been determined ineligible, or e) has been approved for an insufficient amount, (WIA funds may be used for the balance remaining after other funds are applied) or f) a determination is pending. (reimbursement to WIA funds must be made if the customer is subsequently eligible for a Pell grant) 7.) The Customer is not eligible to have training in the appropriate occupation areas paid for through the Employment Services Program (ESP) of the Department of Transitional Assistance or through the Welfare to Work (WtW) program, the Youth Opportunity Grant (YOG) Program, or other such funding source. The Customer is eligible for support through ESP, WtW, YOG, or other such funding source, but the amount of the support is insufficient to pay for the full cost of the training, in which case WIA funds may be used for the balance remaining after other funds have been applied.	

ATTACHMENT 2

MENU OF OPTIONS FOR VERIFYING INFORMATION COLLECTED ON CUSTOMER PORTFOLIO SUMMARY

Element	Information gathering/Verification Options
Address	Self declaration
Income	Self declaration
Citizenship/Right to Work	Document with Alien Registration number
Selective Service registration (if applicable)	Website (see "Instructions for Completing CPS")
Educational	• Standardized test • Completion of grade level rated document
Work History	• Interview
Skills	• Interview • Test
Interests	• Inventory • Interview
Alignment of skills/interests/qualifications with jobs	• Labor market research • Informational interviews
Unique challenges/barriers/characteristics	• Interview

Attachment 3

Student Performance Level (SPL)

Summary Chart

STUDENT PERFORMANCE LEVELS — ABBREVIATED VERSION

0	No ability whatsoever.		
I	• Functions minimally if at all, in English.	• Can handle only very routine entry-level jobs that do not require oral communication, and in which all tasks can be easily demonstrated.	• A native English speaker used to dealing with limited English speakers can rarely communicate with a person at this level except through gestures.
II	• Functions in a very limited way in situations related to immediate needs.	• Can handle only routine entry-level jobs that do not require oral communication, and in which all tasks can be easily demonstrated.	• A native English speaker used to dealing with limited English speakers will have great difficulty communicating with a person at this level.
III	• Functions with some difficulty in situations related to immediate needs.	• Can handle routine entry-level jobs that involve only the most basic oral communication, and in which all tasks can be demonstrated.	• A native English speaker used to dealing with limited English speakers will have great difficulty communicating with a person at this level.
IV	• Can satisfy basic survival needs and a few very routine social demands.	• Can handle entry-level jobs that involve some simple oral communication, but in which tasks can also be demonstrated.	• A native English speaker used to dealing with limited English speakers will have difficulty communicating with a person at this level.
V	• Can satisfy basic survival needs and some limited social demands.	• Can handle jobs and job training that involve following simple oral and very basic written instructions but in which most tasks can also be demonstrated.	• A native English speaker used to dealing with limited English speakers will have some difficulty communicating with a person at this level.

VI	• Can satisfy most survival needs and limited social demands.	• Can handle jobs and job training that involve following simple oral and written instructions and diagrams.	• A native English speaker not used to dealing with limited English speakers will be able to communicate with a person at this level on familiar topics, but with difficulty and some effort.
VII	• Can satisfy survival needs and routine work and social demands.	• Can handle work that involves following oral and simple written instructions in familiar and some unfamiliar situations.	• A native English speaker not used to dealing with limited English speakers can generally communicate with a person at this level on familiar topics
VIII	• Can participate effectively in social and familiar work situations.		• A native English speaker not used to dealing with limited English speakers can communicate with a person at this level on almost all topics.
IX	• Can participate fluently and accurately in practical, social, and work situations		• A native English speaker not used to dealing with limited English speakers can communicate easily with a person at this level.
X	• Ability equal to that of a native speaker of the same socio-economic level.		